

# EXHIBIT 10

### Comparison Chart re. Compliance with SCA

*In re. Rainsy / § 1782 Discovery of Facebook, Case No. 3:18-mc-80024-SK (N.D. Cal.)*

Applicants' Requests for Production of Documents	
Applicant's Request for Production or Deposition Topic	Explanation re. Compliance with Stored Communications Act ("SCA")
1. All documents regarding the "likes" on the Hun FB Account, including without limitation: <ol style="list-style-type: none"> <li>Documents showing the geographic source, date, user and account that sent the "likes."</li> <li>Documents related to any Facebook investigations, analysis and/or actions regarding the "likes."</li> <li>Documents regarding Facebook's own communications, analysis or references (whether internally, with the Hun Group FB Accounts or any other party) regarding the "likes."</li> <li>Communications with the Hun FB Account or its representatives regarding the "likes."</li> </ol>	1. Request does not seek the content of any communications protected by the SCA. <ol style="list-style-type: none"> <li>While this information will connect particular users to a particular communication (the expression of support for Hun via a like), that is not what the SCA prohibits. Rather than seeking unknown content of a known person, we seek the identity of someone who engaged in communication which is already known. <i>See Thompson v. Doel</i>, No. 513CV80088EJDPSG, 2013 WL 5544607 (N.D. Cal. Oct. 7, 2013).</li> <li>While any FB investigation may have included protected communications, this request should not be read to include those communications, per RFP Instruction No. 8.</li> <li>Under the SCA, FB cannot divulge communications "while in electronic storage," defined as "storage ... incidental to the electronic transmission" or "for purposes of backup protection." 18 USC 2510(17). FB's communications with Hun are neither. FB also may not divulge communications "carried ... on behalf of ... a subscriber ... if the provider is not authorized to access the contents." Because FB is authorized to access the contents of communications it has with the Hun regime, they are not protected.</li> <li>See 1(c), above.</li> </ol>
2. All documents regarding the use of technologies or methods (such as click farms, bots, paid support, or other improper means violating Facebook's Terms of Use) to generate "likes" on the Hun FB Account.	2. Most responsive documents will relate to Facebook's own information regarding the technology used by Hun Sen to manipulate his "likes". These are not "content" communications. While theoretically protected communications may exist, those need not be produced, as they are expressly excluded per RFP Instruction No. 8.
3. All documents regarding uses by the Hun Group FB Accounts to: (a) disseminate misleading, false, or fake "news" or propaganda, (b) make threatening or abusive messages to third parties, (c) engage in any other activity that violates any of the FB Policies.	3. Most responsive documents will relate to Facebook's own information regarding the technology used by Hun Sen to manipulate the platform. While protected communications responsive to this request may exist, it should not be read to refer to those communications, per RFP Instruction No. 8.
4. All documents regarding any Facebook investigation, analysis or compliance regarding	4. There should be no protected communications responsive to this Request. FB's internal

the Hun Group FB Accounts' compliance with, or violation of, the FB Policies.	communications and investigations are not protected.
5. All documents regarding communications between You and the Hun Group FB Accounts or their representatives regarding the Hun Group FB Accounts' compliance with, or violation of the FB Policies.	5. FB's communications with the Hun regime are not protected. See 1(c), above. Also, while protected communications responsive to this request may exist, it should not be read to refer to those communications, per RFP Instruction No. 8.
6. All documents and internal communications related to any disciplinary action related to, alleged or actual violations of the FB Policies by the Hun Group FB Accounts.	6. FB's internal communications are not protected by the SCA. See 1(c), above. Also, while protected communications responsive to this request may exist, it should not be read to refer to those communications, per RFP Instruction No. 8.
7. All documents regarding any complaints received by You from third parties regarding the Hun Group FB Accounts, including any alleged violation of the FB Policies.	7. FB's communications with users are not protected. See 1(c), above. Also, while protected communications responsive to this request may exist, it should not be read to refer to those communications, per RFP Instruction No. 8.
8. All communications with Hun Sen or the Cambodian government or its representatives on advertising with or through Facebook.	8. FB's communications with the Hun regime are not protected. See 1(c), above.
9. All documents regarding any negotiation or formal or informal agreement(s) between You and Hun Sen, the Cambodian government and/or any of its representative(s).	9. FB's communications with the Hun regime are not protected. See 1(c), above.
10. All header and meta-data information (i.e., non-content information) regarding: (i) the date, (ii) times, (iii) senders, (iv) recipients, (v) date read, and (vi) forwarding and deleting actions, regarding any communications using any Facebook platform to or from any of the Hun Group FB Accounts regarding (a) Applicant Sam Rainsy. (b) Sam Legal Cases. (c) Cambodia National Rescue Party ("CNRP"). (d) Kem Sokha (imprisoned President of CNRP). (e) Dr. Kem Ley (assassinated human rights activist). (f) Payments to Thy Sovantha.	10. This request explicitly seeks non-content information, which is not protected by the SCA. The fact that the existence of messages relating to certain topics will be revealed is not pertinent; we seek no more information than would be included in a privilege log.
11. Any communications with the Hun Sen FB Accounts or the Cambodian government or its representatives regarding this legal proceeding, i.e., Petitioner Sam Rainsy's Section 1782 Application for Discovery.	11. FB's communications with the Hun regime are not protected. See 1(c), above.
12. All documents regarding payments by the Hun Group FB Accounts or their representatives on advertising with or through Facebook.	12. The vast majority of "documents regarding payments" will not be communication content protected by the SCA. To the extent that protected communications responsive to this request exist, it should not be read to refer to those communications, per RFP Instruction No. 8.

13. Documents sufficient to identify Your current and historical processes and/or procedures for enforcing the FB Policies regarding the use of false, deceptive or misleading “likes” on Facebook accounts.	13. FB’s policy enforcement processes are not communications protected by the SCA. To the extent that protected communications responsive to this request exist, it should not be read to refer to those communications, per RFP Instruction No. 8.
14. Documents sufficient to identify Your current and historical processes and/or procedures for enforcing the FB Policies regarding false, deceptive or misleading news or propaganda made on Facebook accounts.	14. FB’s policy enforcement processes are not communications protected by the SCA. To the extent that protected communications responsive to this request exist, it should not be read to refer to those communications, per RFP Instruction No. 8.
15. Documents sufficient to identify Your current and historical processes and/or procedures for enforcing the FB Policies regarding threatening, harassing or abusive statements made on Facebook accounts.	15. FB’s policy enforcement processes are not communications protected by the SCA. To the extent that protected communications responsive to this request exist, it should not be read to refer to those communications, per RFP Instruction No. 8.

<b>Applicants’ Requests for Production of Documents</b>	
<b>Applicant’s Deposition Topic</b>	<b>Compliance with SCA</b>
1. Your response or enforcement of FB Policies in connection with any activity on the Hun Group FB Accounts.	1. Discussion of FB’s enforcement of its policies against the Hun Group FB Accounts will not involve the content of communications engaged in by those accounts.
2. Any complaints, investigations, analysis or findings regarding the Hun Group FB Accounts.	2. Discussion of complaints/investigations regarding the Hun Group FB Accounts will not involve the content of communications engaged in by those accounts.
3. Your communications with the Hun Group FB Accounts or their representatives, including without limitation, in connection with Applicant’s instant action.	3. FB’s communications with the Hun regime are not protected. See 1(c), above.
4. The funds spent by the Hun Group FB Accounts or their representatives on advertising through Facebook.	4. Discussion of the funds spent by the Hun Group FB Accounts will not involve the content of communications engaged in by those accounts.
5. Your policies and procedures (including the FB Policies) regarding the use of false, deceptive or misleading “likes” on Facebook accounts.	5. Discussion FB’s policies and procedures will not involve the content of user communications.
6. Your policies and procedures (including the FB Policies) regarding false, deceptive or	6. Discussion FB’s policies and procedures will not involve the content of user communications.

misleading news or propaganda made on Facebook accounts.	
7. Your policies and procedures (including the FB Policies) regarding threatening, harassing or abusive statements made on Facebook accounts.	7. Discussion FB's policies and procedures will not involve the content of user communications.
8. The Hun Group FB Accounts' use of Facebook to: <ol style="list-style-type: none"> <li>Disseminate false, deceptive, or misleading information regarding their "likes".</li> <li>Disseminate false, deceptive, or misleading news, propaganda or other such statements.</li> <li>Disseminate threatening, abusive and/or harassing statements against third parties, including against Sam Rainsy or other Cambodian opposition figures, activists or journalists.</li> </ol>	8. This request does not seek the content of any communications protected by the SCA. <ol style="list-style-type: none"> <li>The "dissemination" of information commonly refers to information widely or publicly shared. Such information can be discussed without revelation of any private user communications.</li> <li>The "dissemination" of information commonly refers to information widely or publicly shared. Such information can be discussed without revelation of any private user communications.</li> <li>The "dissemination" of information commonly refers to information widely or publicly shared. Such information can be discussed without revelation of any private user communications. This request should be read to refer to threatening, abusive, and/or harassing messages sent privately to a particular user.</li> </ol>
9. Your communications with any of the Hun Group FB Accounts or their representatives.	9. FB's communications with the Hun regime are not protected. See 1(c), above. Discussion of those communications need not include any private user communications.
10. Any negotiations or formal or informal agreements between You and Hun Sen, the Cambodian government or any of its representative(s).	10. FB's communications with the Hun regime are not protected. See 1(c), above. Discussion of those communications need not include any private user communications.
11. Your search, review and production of documents in connection with Applicant's Section 1782 Application, including without limitation, regarding any claims of privilege or confidentiality that You may assert.	11. This topic involves actions taken by FB, not any private user communications.
12. The authentication of any document produced by You pursuant to Applicant's Section 1782 Application.	12. This topic involves actions taken by FB, not any private user communications.